

PATENT
Application # 10/666,227
Attorney Docket # 2002P15657US01 (1009-040)

REMARKS

Applicant respectfully thanks the Examiner for the consideration provided to this application, and respectfully requests reconsideration of this application.

Each of claims 1, 33, and 34 has been amended for at least one reason unrelated to patentability, including at least one of: to explicitly present one or more elements, limitations, phrases, terms and/or words implicit in the claim as originally written when viewed in light of the specification, thereby not narrowing the scope of the claim; to detect infringement more easily; to enlarge the scope of infringement; to cover different kinds of infringement (direct, indirect, contributory, induced, and/or importation, etc.); to expedite the issuance of a claim of particular current licensing interest; to target the claim to a party currently interested in licensing certain embodiments; to enlarge the royalty base of the claim; to cover a particular product or person in the marketplace; and/or to target the claim to a particular industry. Support for the amendments to each of claims 1, 33, and 34 can be found in the specification, as originally submitted, at least at pages 20-24, paragraphs 79-82. It is respectfully submitted that no new matter has been added.

Claims 1-39 are now pending in this application. Each of claims 1, 33, and 34 are in independent form.

I. The Anticipation Rejections

Each of claims 1-12 and 14-39 was rejected as anticipated under 35 U.S.C. 102(b). In support of the rejection, various portions of a publication, "SIMATIC Process Control System PCS 7 WinCC Basic Process Control, 2000" ("PCS7") were applied. These rejections are respectfully traversed as moot in view of the present amendments to each of claims 1, 33, and 34.

Specifically, each of claims 1, 33, and 34, from one of which each of claims 2-12, 14-32, and 35-39 ultimately depends, states, *inter alia*, yet PCS7 does not teach "responsive to a detected collision between a parent node of said linked hierarchically organized plurality of HMI screen nodes and a first child node of a plurality of child nodes of said parent node, automatically recursively adjusting a position of said parent node until an adjusted position of said parent node does not create, with respect to each child node of said plurality of child nodes, a determined

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collision with said child node, said determined collision determined based upon said adjusted position of said parent node and a calculated position of said child node". For at least this reason, it is respectfully submitted that the rejection of claims 1, 33, and 34 is unsupported by PCS7 and should be withdrawn. Also, the rejection of claims 2-12, 14-32, and 35-39, each ultimately depending from one of independent claims 1, 33, or 34, is unsupported by PCS7 and also should be withdrawn.

II. The Obviousness Rejections

Claims 13 was rejected under 35 U.S.C. 103(a) as being unpatentable over various combinations of the publication, "SIMATIC Process Control System PCS 7 WinCC Basic Process Control, 2000" ("PCS7"), and/or U.S. Patent No. 6,421,571 ("Spriggs"). This rejection is respectfully traversed as moot in view of the present amendments to claim 1.

As stated, *supra*, claims 1, from which claims 13 ultimately depends, states, *inter alia*, yet PCS7 does not teach "responsive to a detected collision between a parent node of said linked hierarchically organized plurality of HMI screen nodes and a first child node of a plurality of child nodes of said parent node, automatically recursively adjusting a position of said parent node until an adjusted position of said parent node does not create, with respect to each child node of said plurality of child nodes, a determined collision with said child node, said determined collision determined based upon said adjusted position of said parent node and a calculated position of said child node". For at least this reason, it is respectfully submitted that the rejection of claim 13 is unsupported by PCS7 and should be withdrawn.

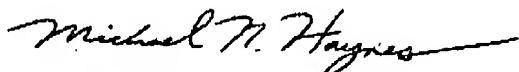
PATENT**Application # 10/666,227****Attorney Docket # 2002P15657US01 (1009-040)****CONCLUSION**

It is respectfully submitted that, in view of the foregoing amendments and remarks, the application as amended is in clear condition for allowance. Reconsideration, withdrawal of all grounds of rejection, and issuance of a Notice of Allowance are earnestly solicited.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. 1.16 or 1.17 to Deposit Account No. 50-2504. The Examiner is invited to contact the undersigned at 434-972-9988 to discuss any matter regarding this application.

Respectfully submitted,

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